

UNITED STATES OF AMERICA	§	
ex. rel. Lisa Wheeler,	§	
	§	
Plaintiff,	§	
	§	
v.	§	NO. 5:13-CV-00004-HLH
	§	
UNION TREATMENT CENTERS, LLC;	§	
UNION TREATMENT CENTER – AUSTIN,	§	
LLC; UNION TREATMENT CENTER –	§	
KILLEEN, LLC; UNION TREATMENT	§	
CENTER – SAN ANTONIO, LLC; UNION	§	
TREATMENT CENTER – CORPUS	§	
CHRISTI, LLC; UTC MANAGEMENT,	§	
LLC; UTC PROVIDERS – AUSTIN, INC.;	§	
UTC PROVIDERS – KILLEEN, INC.; UTC	§	
PROVIDERS – SAN ANTONIO, INC.; UTC	§	
PROVIDERS – CORPUS CHRISTI, INC.;	§	
CREEKSIDE SURGICAL, PLLC;	§	
CREEKSIDE DIAGNOSTICS, LLC;	§	
CCM&D CONSULTING, LLC; GARRY	§	
CRAIGHEAD; CHRISTINE CRAIGHEAD	§	
	§	
Defendants.	§	

**UNOPPOSED MOTION TO EXTEND THE UTC DEFENDANTS’
DEADLINE TO FILE RESPONSIVE PLEADINGS TO THE UNITED
STATES OF AMERICA’S COMPLAINT IN INTERVENTION**

Union Treatment Centers, LLC, Union Treatment Center – Austin, LLC, Union Treatment Center – Killeen, LLC, Union Treatment Center – San Antonio, LLC, Union Treatment Center – Corpus Christi, LLC, UTC Management, LLC, UTC Providers – Austin, Inc., UTC Providers – Killeen, Inc., UTC Providers – San Antonio, Inc., and UTC Providers – Corpus Christi, Inc. (collectively, “UTC Defendants”) file this Unopposed Motion to Extend the Deadline to File Responsive Pleadings to the United States of America’s Complaint in

Intervention (the “Motion”). In support of the Motion, UTC Defendants respectfully show the Court as follows:

1. UTC Defendants’ deadline to file a responsive pleading to United States of America’s Complaint in Intervention was January 22, 2016.
2. UTC Defendants seek to extend their responsive pleading deadline to February 29, 2016, because they are deep in settlement negotiations with the United States. The parties anticipate that they will know by February 29, 2016, whether they will be able finalize a settlement.
3. This Motion is not made for delay but to permit the orderly resolution of issues in this case.
4. Counsel for UTC Defendants has conferred with John LoCurto, counsel for the United States, and he agreed not to object.

For the forgoing reasons, UTC Defendants request the Court extend the deadline for UTC Defendants to file a pleading in response to United States of America’s Complaint in Intervention to February 29, 2016.

Respectfully submitted,

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By: /s/ Afton Dee Sands

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COUNSEL FOR THE UTC DEFENDANTS

CERTIFICATE OF CONFERENCE

I certify that I conferred with John LoCurto, counsel for the United States of America, regarding this motion and he agreed not to object.

/s/ Afton Dee Sands

Afton Dee Sands

CERTIFICATE OF SERVICE

I certify that on January 25, 2016, the foregoing document was electronically filed with the clerk of the court for the United States District Court for the Western District of Texas using the electronic case filing system, which will send notification to the following attorneys of record:

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